

The Workwell group of companies

Modern Slavery Act Statement, FYE September 2025

1. Introduction:

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Workwell has taken, and continues to take, to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We take a zero-tolerance approach to modern slavery, servitude, forced or compulsory labour and human trafficking. Moreover, we recognise that as a responsible corporate citizen Workwell has a responsibility to be alert to the risks of this, however small, both in its business and the wider supply chain. To this end our staff are fully aware of our company policy and are committed to reporting any concerns to management who in turn will be expected to act responsibly and ethically.

2. Structure of the organisation:

Workwell is a private equity backed provider of employment, payroll, accountancy, outsourced back-office and ancillary services to the recruitment sector, both throughout the UK and globally.

Established in 1989, compliance, service and diligent professionalism are primary to our services.

3. Where are we?

We are a UK based company headquartered in Watford, Hertfordshire.

4. What do we stand for?

Our business is compliance led with a strong customer-centric and technology-driven approach to delivering our services. We operate in a highly regulated environment and absolute compliance with tax regulation and employment law is at the heart of our offering.

Workwell has been an accredited member of the Freelancer and Contractor Services Association (www.FCSA.org.uk), the trade association that sets the highest standard of compliance in the sector and drives the compliance agenda with HMRC, since 2011.

Accreditation requires an annual independent third-party assessment of compliance across all relevant business areas, including our approach to preventing modern slavery within our business and supply chains.

5. Our clients and workers:

As a contractor umbrella and accountancy firm, a large part of our business involves the employment and/or engagement of freelancers undertaking agency assignment work. To ensure modern slavery or human trafficking is not taking place within our business, prior to any engagement, we undertake a full assessment to ascertain the most appropriate solutions available to the worker, engaging in discussion and considering

contract rates and their individual circumstances, how they started working as a freelancer, and their appetite for contracting in the long-term.

We liaise with the agency placing the worker to ensure the pay rate is above a certain level, and we maintain continuous contact with individuals to ensure our services remain appropriate based on their circumstances.

Prior to engaging with any individual contractually, we ensure they are subject to full identity and UK right to work checks using an approved and accredited IDSP.

Clients that utilise our outsourcing services are almost exclusively UK-based recruitment agencies, for which we perform several back-office functions including the validation of worker identity. All workers are paid for work they've undertaken after the appropriate deductions are made by Workwell and paid to HMRC. We have strict and documented procedures for the onboarding of all clients, which are consulted to ensure the right service options are presented in all cases. Client Due Diligence is undertaken on each client and staff are provided with training to identify risks.

Finally, clients that engage us as accountants are subjected to full AML checks, including CDD and enhanced CDD where required and in accordance with our AML policy and procedures. These clients are almost exclusively one-person limited companies (PSCs) or SMEs, with which we maintain continuous contact throughout their engagement.

6. Our suppliers:

Due diligence, both financial and reputational, is conducted on all suppliers before entering any contractual arrangement.

7. Training:

Training is regularly conducted, and our Modern Slavery Policy is distributed to all staff through our online LMS.

We maintain various codes of conduct and a Whistleblowing Policy, providing a confidential channel for employees and stakeholders to report concerns, including potential modern slavery risks.

8. Approval for this statement:

This statement was approved on 18th February 2026 and will be reviewed annually.

James Harris
Compliance Director (UK)

